

ESTTA Tracking number: **ESTTA714260**

Filing date: **12/11/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91206284
Party	Defendant Haze Tobacco, LLC
Correspondence Address	BOBBY A GHAJAR PILLSBURY WINTHROP SHAW PITTMAN LLP 725 SOUTH FIGUEROA STREET, SUITE 2800 LOS ANGELES, CA 90017-5406 UNITED STATES Bobby.Ghajar@pillsburylaw.com, marcus.peterson@pillsburylaw.com, Docket_IP@pillsburylaw.com, la-tmdocketing@pillsburylaw.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Marcus Peterson
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Signature	/Marcus Peterson/
Date	12/11/2015
Attachments	12-11-15 Consent Motion to Suspend.pdf(888852 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Starbuzz Tobacco, Inc.	§	
	§	
Opposer,	§	Opposition No. 91206284
	§	
	§	
Haze Tobacco, LLC	§	Serial No. 85303577
	§	
Applicant	§	Mark: HAZE TOBACCO

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

**CONSENTED MOTION TO SUSPEND PROCEEDINGS FOR NINETY DAYS**

The Parties, through their undersigned counsel, respectfully request that the Board suspend the proceedings for 90 days and then reset all deadlines accordingly. The new deadlines would be as follows:

<b>Time to Answer</b>	03/10/2016
<b>Deadline for Discovery Conference</b>	04/09/2016
<b>Discovery Opens</b>	04/09/2016
<b>Initial Disclosures Due</b>	05/09/2016
<b>Expert Disclosure Due</b>	09/06/2016
<b>Discovery Closes</b>	10/06/2016
<b>Plaintiff's Pretrial Disclosures</b>	11/20/2016
<b>Plaintiff's 30-day Trial Period Ends</b>	01/04/2017
<b>Defendant's Pretrial Disclosures</b>	01/19/2017
<b>Defendant's 30-day Trial Period Ends</b>	03/05/2017
<b>Plaintiff's Rebuttal Disclosures Due</b>	03/20/2017
<b>Plaintiff's 15-day Rebuttal Period Ends</b>	04/19/2017

This request is not filed for purposes of delay. The parties continue to be engaged in bilateral settlement discussions to resolve not only this opposition, but also Opposition No. 91206746 for the mark HAZE COLADA along with global issues relating to the parties' uses of

their respective marks in the United States and abroad. Because the settlement discussions between the parties are confidential, specific issues on which they have agreed cannot be disclosed.

Counsel for Opposer sent the most recent revisions to a draft settlement agreement to counsel for Applicant in early December. The principals discussed the agreement and are planning to meet in person in Dubai on December 14, when they will both be there on business. The parties expect to resolve the remaining issues and finalize a settlement agreement shortly thereafter.

Accordingly, good cause exists to further suspend this proceeding and the Parties respectfully request that the Board reset the dates as set forth above.

Respectfully Submitted,

DATED: December 11, 2015

By: /s/ Bobby A. Ghajar  
Bobby A. Ghajar  
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Attorneys for Applicant  
Haze Tobacco, LLC

By: /s/ Natu J. Patel  
Natu J. Patel  
The Patel Law Firm PC  
22952 Mill Creek Drive  
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Opposer  
Starbuzz Tobacco, Inc.

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing CONSENTED MOTION TO SUSPEND PROCEEDINGS FOR NINETY DAYS was sent to counsel for Opposer, Natu J. Patel, The Patel Law Firm PC, 22952 Mill Creek Drive, Laguna Hills, CA 92653 via email to [NPatel@thePatelLawFirm.com](mailto:NPatel@thePatelLawFirm.com) on this 11th day of December, 2015.

/s/ Marcus Peterson

Marcus Peterson